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VIA ELECTRONIC FILING

November 9, 2018

EX PARTE NOTICE

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Amendments to Part 4 of the Commission's Rules Concerning Disruptions to Communications, PS Docket No. 15-80, New Part 4 of the Commission's Rules Concerning Disruptions to Communications, ET Docket No. 04-35, and The Proposed Extension of Part 4 of the Commission's Rules Regarding Outage Reporting to Interconnected Voice Over Internet Protocol Service Providers and Broadband Internet Service Providers, PS Docket No. 11-82

Dear Ms. Dortch:

On November 7, 2018, at the request of the Public Safety and Homeland Security Bureau ("Bureau"), Francisco Silva, General Counsel of Puerto Rico Telephone Company, Inc. ("PRTC") and the undersigned participated in a meeting with James Wiley, Brenda Villanueva (via telephone), Julia Tu and intern Madeline Meckes of the Bureau. The purpose of the meeting was to discuss issues regarding the sharing of Network Outage Reporting System and/or Disaster Information Reporting System information (collectively, "outage information") with state and local entities.

During the meeting, PRTC stated that it understands the reasons why sharing outage information with state and local entities may be beneficial, particularly during times of emergency. However, PRTC stated that outage information is competitively sensitive and its disclosure to third parties may implicate national security concerns. Therefore, PRTC stated that outage information, if shared with state and local entities, must continue to be afforded confidential treatment.

PRTC stated that the Commission should be very selective on identifying the state and local entities that would have access to outage information. For instance, although the Commission sometimes refers to the municipalities in Puerto Rico as "counties," the municipalities do not have the same public safety responsibilities that counties in the continental United States do. Therefore, PRTC stated that it cannot see a reason why outage information would need to be shared with the municipalities.

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PRTC recommended that access to outage information be limited to personnel at the relevant state or local entity with an absolute need for such information. PRTC strongly supports that such personnel be subject to specific training on how to handle outage information to ensure its confidentiality. In addition, the Commission should require state and local personnel with access to outage information to sign a certification attesting that they have undertaken security training and will access and use the information only for the public safety purposes for which it is intended.

Bureau staff asked if PRTC's security agreement with the U.S. government requires the reporting of outages. PRTC has confirmed that its security agreement does not impose such a requirement.

This letter is submitted in accordance with Section 1.1206(b) of the Commission's rules, 47 C.F.R. § 1.1206(b). Please contact the undersigned if there are questions concerning this filing.

Respectfully submitted,

/s/ Edgar Class

Edgar Class
Counsel for Puerto Rico Telephone Company, Inc.

cc: James Wiley
Brenda Villanueva
Julia Tu
Madeline Meckes